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STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

650 Addison Avenue West, Suite 110 • Twin Falls, Idaho 83301 • (208) 736-2190
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

February 16, 2018

Lynn Babington
1107 E. 2900 S.
Hagerman, ID. 83332

Re: Compliance Inspection at Irish Ponds, Buhl, Idaho NPDES Permit No. IDG130102

Dear Mr. Babington:

On January 17, 2018, Craig Thomas of the Department of Environmental Quality (DEQ) conducted a compliance inspection of the Irish Ponds facility on behalf of EPA. The purpose of this inspection was to determine compliance with the Clean Water Act, specifically compliance with the facility's National Pollutant Discharge Elimination System (NPDES) Permit No. IDG130102.

DEQ appreciates the cooperation and assistance you provided during the inspection. A copy of the inspection report has been enclosed for reference. At the time of the inspection, areas of concern were identified. Please take the corrective actions necessary to address the following concerns:

- QA plan not developed and implemented within 60 days of permit coverage.
- QA plan certification not submitted within 90 days of permit coverage.
- BMP plan not developed and implemented within 90 days of permit coverage.
- BMP plan certification not submitted within 90 days of permit coverage.
- The QA plan is not in the EPA/QA/R-5 and EPA/QA/G-5 format and is missing:
  - Updated water quality testing laboratory;
  - Calibration procedures;
  - Details on the number of samples;
  - Type of sample containers;
  - Type and number of quality assurance field samples;
  - Precision and accuracy requirements;
  - Water quality testing laboratory name lists a company no longer in business;
  - Map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling.

Please ensure all aspects of your operation are conducted in accordance with applicable federal, state, and local requirements. The inspection report in its entirety has been submitted to EPA, which retains all rights to pursue enforcement actions to address these concerns and any other violations.

If you have any questions regarding this matter, please contact Craig Thomas at craig.thomas@deq.idaho.gov or 208-736-2190 or alternatively Maria Lopez at Lopez.Maria@epa.gov or (208-378-5616)

Sincerely,

Craig Thomas
Aquaculture Coordinator

CT:sh

Enclosure (1)

Idaho Department of Environmental Quality
AQUACULTURE FACILITY INSPECTION REPORT
NPDES Permit Number IDG-130102

Effective: December 1, 2007. Expiration: November 30, 2012

NOI Submission: **May 29, 2012**

PURPOSE OF INSPECTION	Evaluate system compliance with NPDES permit and the Clean Water Act.
TYPE OF INSPECTION	Announced Compliance Evaluation Inspection
DATE(s) OF PREVIOUS NPDES INSPECTIONS	Date: **08/29/2007** Date: **08/04/2005** Date: **06/26/2001**
PENDING OR CURRENT ENFORCEMENT ACTIONS (review NOV and warning letters on file)	**NOV – 5/29/2001** **NOV – 1/2/2001**
PRIMARY FACILITY NAME	**Irish Ponds**
OTHER NAME(S) USED FOR FACILITY	**Snyder Blue Rock Farms, Inc.**
NPDES PERMIT #	**IDG-130102**
FACILITY CONTACT	Name: **Lynn Babington** Position: **President** Phone Number: **208-834-4860** Fax Number: **208-837-6322** Email: **arkfisheries@yahoo.com**
FACILITY SIZE (annual fish production; affects frequency of monitoring requirements in parentheses). Confirm production and monitoring frequency during the inspection.	< 100,000 (semi-annual)
INSPECTOR(s) AND AFFILIATION 	**Craig Thomas** **Regional Aquaculture Coordinator** **Idaho Department of Environmental Quality** **Twin Falls Regional Office**
DATE OF INSPECTION	Date: **01/17/2018** Arrival Time: **09:00 AM** Departure Time: **11:45 AM**
Photo of facility sign, if any, and facility	**N/A**
Google Earth Map—Facility Overview—See Exhibit B & C for complete facility overview, with GPS waypoints and digital Photographs.	

DATE OF FINAL REPORT	Date: February 16, 2018

ENTRY AND PERMIT CONDITIONS REVIEW

This was an announced inspection. Mr. L. Babington was contacted on January 9, 2018, to schedule the January 17th inspection for the Irish Ponds aquaculture facility.

I arrived at the Irish Ponds facility at 09:00AM to meet Mr. L. Babington and Doug Babington (b) (6) I presented my credentials and discussed the purpose of the visit prior to the inspection. Access to the facility was not denied.

On-site inspections of the farm took place first followed by paperwork and document reviews. The inspection concluded at approximately 11:45AM with an exit interview, where any areas of concern were presented, and a review of what to expect from DEQ following the completion and submission of the inspection report to EPA.

Irish Ponds' facility consists of five concrete raceways with quiescent zones at the bottom of each raceway for capturing solids. Below the raceways, there is a full-flow settling basin (FFSB) for additional settling of solids. The water supply for Irish Ponds is from an unnamed seep spring. Wastewater from the facility flows out of the FFSB into a ditch (discharge monitoring location) which travels approximately ¼ to ½ mile where it discharges to Mud Creek.

No areas of concern were discovered by DEQ's records search, however, EPA's Integrated Compliance Information System (ICIS) system displayed a late receipt code for the 2016 annual report.

However, the submitted QA plan appears to be inconsistent with the EPA/QA/R-5 and EPA/QA/G-5 guidelines. The QA plan is not in the EPA format and is missing:

- Updated water quality testing laboratory information;
- calibration procedures;
- details on the number of samples;
- type of sample containers;
- type and number of quality assurance field samples;
- precision and accuracy requirements;
- Water quality testing laboratory name lists a company no longer in business;
- and map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling.
- QA plan not developed and implemented within 60 days of permit coverage.
- QA plan certification not submitted within 90 days of permit coverage.
- BMP plan not developed and implemented within 90 days of permit coverage.
- BMP plan certification not submitted within 90 days of permit coverage.

OPENING CONFERENCE	
1. Explain the purpose of the inspection and how the inspection will proceed.	Remarks: **Completed**
2. Review the issuance and expiration dates of the facility's NPDES permit.	Remarks: **Completed**
3. [I.C.3.c.] Explain the NOI and the date of submission prior to the expiration date of the permit (June 3, 2012 – 180 days prior to expiration).	Remarks: **Completed**
4. Explain that the inspection will involve a review of DMRs, QA Plan, BMP Plan, the most recent NOI, Receiving Water Monitoring Report & the Annual Report.	Remarks: **Completed**
5. Explain that the inspection will involve a site tour/visit of the facility.	Remarks: **Completed**
6. Are all necessary personnel present for the inspection?	Remarks: **Completed**
7. Will any chemicals or hazardous chemicals be encountered during the site tour/visit?	Remarks: **Completed**
8. Does the permittee have any questions before proceeding with the inspection?	Remarks: **Completed**
PRELIMINARY QUESTIONS	
1. Obtain representative's name, position, and phone number.	Name: **Lynn Babington** Position: **President** Phone: **208-834-4860** Email: **arkfisheries@yahoo.com**
2. How long has the representative worked for the company?	**About 40 years**
3. How long has he/she held the position?	**About 40 years**
4. Other representative(s) present for the inspection.	Name: **Doug Babington** Position: **Manager** Phone: **208-837-4913**

	Email: **babington3@gmail.com**

NOTICE OF INTENT (NOI)	
NOI Review: Show the interviewee the NOI, and ask him/her to review it for errors. If errors are found, ask him/her to correct the errors and initial the corrections. A new NOI should be submitted if several corrections are made.	
1. What is the date of the most recently submitted NOI?	**02/3/2018**
2. Is the NOI complete and current?	**Yes**
3. Have any structural changes been made to the facility recently?	**No**
4. Any structural changes anticipated? (Plan and Spec review required of DEQ, if so; see page 47; Part VI.I.2.)	**No**

FACILITY LOCATION, ETC. (see NOI)	No physical mailing address. **Latitude: 42.59009262** **Longitude: -114.8098763** Phone: **N/A** Fax: **N/A** Email: **N/A**
OWNER NAME	**Lynn & Kathy Babington**
OWNER ADDRESS	Address: **1107 East 2900 South** **Hagerman, ID. 83332** Phone Number: **208-837-4860** Fax: **N/A** E-mail: **arkfisheries@yahoo.com**
OPERATOR NAME	**ARK Fisheries, Inc.**
OPERATOR ADDRESS	Address: **1107 East 2900 South** **Hagerman, ID. 83332** Phone Number: **208-837-4860** Fax: **N/A** E-mail: **arkfisheries@yahoo.com**
PERMIT TRANSFERS 1. Is this a new operator?	**Yes**
If new, review the following: According to VII. I. "Transfers. Authorization to discharge under this permit may be automatically transferred to a new permittee on the date specified in the agreement only if: 1. The current permittee notifies the Director of the Office of Water and Watersheds at least 30 days in advance of the proposed transfer date; 2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility and liability between them; and 3. The Director does not notify the existing permittee and the new permittees of its intent to revoke and reissue the authorization to discharge.	
2. Was EPA and DEQ notified in writing of the transfer?	**Yes,** Notification sent May 7, 2014.
LOCATION OF FACILITY Previous GPS: **None stated** Latitude: Longitude: Date: Time:	GPS taken at entrance to facility: Latitude: N **42.59009262** Longitude: **W -114.8098763** Date: **1/17/2018** Time: **11:41**
	Google Earth GPS at entrance to facility: Latitude: **N 42.590108**

Aquaculture Facility Inspection Survey

	Longitude: **W -114.809884** Elevation: **3658 feet** Date: **06/08/2016 (satellite image date taken)**

AUTHORIZATION TO DISCHARGE	
1. Did you receive a letter authorizing you to discharge?	**No** - Mr. L. Babington did not receive a new letter from EPA authorizing him to discharge. He has a copy from Claudia Snyder, which gave permission to discharge.
2. "Addressee" on the authorization to discharge letter: 3. Is this correct?	Name: **Claudia Snyder, as Snyder Blue Rock Farms.** **No, Lynn Babington ARK Fisheries Inc.**
4. Do you have a copy of the permit?	**Yes**
5. Is the facility currently discharging?	**Yes**
6. Was the facility containing, growing or holding fish on December 1, 2007 (effective date of the permit)?	**Yes**
7. If not currently discharging, when do you expect to rear fish again at this facility?	**N/A**
8. [II.A.1. & 2. (p 10)]Do you plan to participate in Pollutant Trading?	**Yes**-would like to keep the option open.

PROHIBITED DISCHARGES	
Part II.B., Page 29. Review the prohibited discharges 1 & 2 (a-h) with the interviewee. **COMPLETED**	
1. Have you had any such prohibited discharges that you know of since December 1, 2007?	**No**
2. Do you expect to have any difficulty prohibiting such discharges from this facility?	**No**

PROHIBITED PRACTICES	
Part II.C., Pages 29-30. Review the prohibited practices 1 - 2 with the interviewee. **COMPLETE**	
1. Have you or any other employee engaged in any of these prohibited practices that you know of since December 1, 2007?	**No**
2. Do you expect to have any difficulty prohibiting such practices at this facility?	**No**

DMR - FACILITY MONITORING REQUIREMENTS	
Part II.D., (see page 30-33). Ask to see the recent DMRs and raw data. Review to determine if the permittee is filling in the correct data (influent, effluent raw data, and effluent net). See page 30, II.D.2.b., for requirement when data are less than MDL. According to II. D., "The permittee shall monitor discharges from all outfalls authorized under the permit as specified in Tables 12 and 13…" (see pages 30-33) For frequency requirements, see footnote 16 of Table 12, and footnote 29 of Table 13 for OLSBs)	
1. When was the last monitoring event?	Mr. L. Babington stated that the last monitoring event took place on 12/13/17.
2. Who conducted the monitoring?	Mr. L. Babington stated that Doug Babington conducts the monitoring.
3. Is this the person who usually conducts the monitoring?	**Yes**

4. Who fills out the DMRs?	Mr. L. Babington stated that he fills out the DMRs.
5. When was the most recent DMR submitted to EPA and DEQ?	Mr. L. Babington stated that most recent DMR submitted to EPA and DEQ was 01/15/2018.
6. [II.D.1.] Do you monitor discharges from all outfalls authorized under this permit as specified in Table 12 (p 31) (Raceways and FFSBs) and Table 13 (p 32) (OLSBs)?	**Yes**
7. [II.D.2.a.] Do you use methods that can achieve MDLs less than or equal to those specified in Table 15 (p 34)?	**Yes**
8. [II.D.2.b.] For purposes of reporting on the DMR, do you comply with Appendix D, 4?	**Yes**

9. Influent Water Sources	
a. How many influent sources?	Mr. L. Babington stated only one influent source is available, and used at the facility from an unnamed seep tunnel.
b. Are all influent sources monitored for flow?	**Yes**
c. Are all influent sources monitored for WQ parameters?	**Yes**
d. Are all influent sources combined into one sample to determine flow and/or WQ parameters?	**Yes**
10. Raceways and FFSBs Discharges [II.D.3] (Table 12, p 31)	
a. [II.D.3.a.] Timing: Are all influent and effluent samples and flow measurements taken on the same day?	**Yes**
b. [II.D.3.a] Timing: If your facility has multiple effluent discharge points and/or influent points, do you composite samples from all points proportionally to their respective flow?	**N/A**
c. [II.D.3.b.] Location: Are effluent samples from the effluent stream collected just prior to discharge into the receiving waters?	**Yes**
d. [II.D.3.b.] Location: If the effluent stream mixes with other flows, do you collect effluent samples from the effluent stream just prior to discharge into receiving waters?	**N/A**
e. [II.D.3.b.] Location: If the facility with raceways discharges to a FFSB(s), do you collect effluent samples from the FFSB(s) just prior to discharge into the receiving waters?	**Yes**
f. [II.D.3.c.] Small discharges: Does the facility have small discharges that comprise less than 1% of the total raceway flows?	**No**
g. [II.D.3.c.] Small discharges: Are the flows of these small discharges monitored at a minimum of once per year?	**N/A**
h. [Table 12, p 31, Footnote 17] What is the interval of discrete sampling for the composite sample? (The permit requires four or more discrete samples taken at one-half hour intervals or greater in a 24 hour period.)	Mr. L. Babington stated that a sample is taken at least 30 minutes apart, four times throughout 24 hour period.
i. [Table 12, p 31, Footnote 17] When sampling raceway discharge, is at least one sample taken during quiescent zone or raceway cleaning? ("at least ¼ of the samples")	**Yes**
If not, why not?	N/A
j. [Table 12, p 32, Footnote 17] What types of samples are taken for influent? (permittees with spring influents may elect to take grabs, page 32, footnote 17)	Mr. L. Babington stated that composite samples are taken at the influent.
k. How and where is flow measured for the raceways? And by whom?	Mr. L. Babington stated that flow measurement is taken using a contracted sharp-crested rectangular weir at the bottom of raceway #3, by reading the staff gauge.
l. [Table 12, p 31, Footnote 14] Is this flow measurement method one of those specified in Appendix E. Part I.A. (p 79)?	**Yes**

m. [Table 12, p 32, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	**Yes**
n. [Table 12, p 31, Footnote 15] Is flow measurement taken concurrently with each pollutant sampling, when applicable, once for every composite sample?	**Yes**—Mr. L. Babington stated that the flow measurement is taken only one time on a sampling day, and he does a visual inspection for changes in water flow. The unnamed seep tunnel spring flow provides a constant flow that normally does not fluctuate in a 24 hour period.
Or is it taken on either the influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	**N/A**
11. How is the flow measuring device calibrated? And by whom?	Mr. L. Babington stated that he calibrates the measuring device by using a level and sealing up leaks below the top dam board.
12. OLSBs Monitoring Measurements [II.D.4.]: This facility does not have an OLSB	
a. [II.D.4.] Does the facility collect effluent samples from the effluent stream just prior to discharge into the receiving waters?	**N/A**
b. [Table 13, p 32, Footnote 25] Are OLSB influent and effluent samples collected during quiescent zone cleaning?	**N/A**
c. How and where is flow measured for the OLSBs? And by whom?	**N/A**
d. [Table 13, p 32, Footnote 27] Is the flow measurement one of those specified in Appendix E.I.A.?	**N/A**
e. [Table 13, p 33, Footnote 28] For OLSB effluent or influent, are flow measurements taken concurrently with pollutant sampling, when applicable?	**N/A**
Or is it taken on either OLSB influent or effluent as long as the measurement at that location accurately reflects the discharge flow to the receiving water?	**N/A**
f. [Table 13, p 33, Footnote 30] Does the facility monitor for composite samples?	**N/A**
If so, does the composite sample represent 4 or more discrete samples taken at ½ hour intervals or greater in a 24-hour period?	**N/A**
Do the composite samples represent multiple effluent discharge points and/or influent points as same day samples from all points proportionally to their respective flows?	**N/A**
g. How and where is flow measured for the OLSBs? And by whom?	**N/A**
h. How is the flow measuring device calibrated? And by whom?	**N/A**

i. [Table 12, p 31, Footnote 16] What is monitoring frequency of the OLSBs?	**N/A**

k. [Table 12, p 31, Footnote 18] Are all influent and effluent samples and flow measurements taken on the same day?	**N/A**
l. [Table 12, p 32, Footnote 20] Does the facility monitor for temperature?	**N/A**
m. [Table 12, p 32, Footnote 21] Does the facility monitor for copper?	**N/A**
13. [Table 12, p 32, Footnote 19] Was net effluent load recorded on the DMR calculated correctly? (check a few DMRs; see Appendix D, page 75 for equations)	**N/A**
14. Are you aware of any recent violations of the permit limits? What was the limit that was exceeded? Date of the exceedance.	**N/A**
15. Are the data reported properly on the DMRs?	**N/A**
16. Are DMR data consistent with analytical results?	**N/A**

RECEIVING WATER MONITORING	
Part II.E., (see pages 33-35). According to II.C.1., "All permittees with OLSB that discharge directly to receiving water must conduct receiving water monitoring for ammonia, pH, and temperature upstream from the outfall." And 2, "All facilities using chelated copper compounds or copper sulfate must monitor total recoverable copper and hardness immediately upstream of the outfall at least once in any quarter when these compounds are applied..." Ask to see the QA Plan which will describe where the samples are taken in the receiving stream.	
1. [II.E.1.] Does the facility have an OLSB discharging to a receiving stream? If so, are you monitoring receiving water for ammonia, pH, and temperature upstream from the outfall?	**No.** **N/A**
2. [II.E.2.] Does the facility use chelated copper compounds or copper sulfate? If so, are you monitoring receiving water for total recoverable copper and hardness immediately upstream of the outfall in any quarter?	**N/A**
3. [II.E.3.] Are receiving water samples grab samples and are they collected during the time when effluent composite samples are being collected for the same parameters?	**N/A**
4. [II.E.4.] Are receiving water samples analyzed using EPA approved methods capable of achieving method detection limits (MDLs) that are equivalent to or less than those listed in Table 15 (Permit, p 34)?	**N/A**
5. [II.E.5.]Are you submitting the results to EPA and DEQ with the DMRs?	**N/A**

6. [II.E.6.] Are receiving water monitoring results submitted to EPA with copies to DEQ with the DMRs for the month when the monitoring is conducted? Does the DMR report include all information required in Part V.E. and a summary and evaluation of the analytical results, including a short discussion of the accuracy and precision of the data, any problems with sample collection or analysis that may have affected the results, or what conditions existed at the time of the sample collection that may be relevant to how representative the data may be of the normal conditions at that site?	**N/A**
7. [II.E.7.] Is quality assurance/quality control plans (QAQC plans) for all the monitoring, documented in the QA Plan required under Part II.F (Quality Assurance Plan)?	**N/A**

QUALITY ASSURANCE PLAN (QA PLAN)	
Part II.F., (see page 35). According to II.F. "The permittee must develop a QA plan for all monitoring required by this permit. The plan must be developed and implemented within 60 days of coverage under this permit."	
1. [II.F.] Do you have a QA plan?	**Yes**
2. [II.F.] When did you submit the certification (Appendix F) that a plan has been developed and is being implemented?	A QA plan was submitted on 02/03/2018.
3. [II.F.1.] Is the QA Plan designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur?	Mr. L. Babington stated that he feels the QA plan is designed to assist in planning for the collection and analysis of effluent and receiving water samples in support of the permit and in explaining data anomalies when they occur. DEQ, was unable to find any supporting documentation relating to explaining data anomalies in the submitted QA plan.
4. [II.F.2.] During all sample collection and analysis activities, does the permittee use the EPA-approved quality assurance and quality control (QA/QC) and chain-of-custody procedures described in EPA/QA/R-5 and EPA/QA/G-5?	**No,** based on the missing information outlined in responses to questions numbers 5, 6, 10, & 13 below. **Yes,** copies of the chain-of-custody forms were included in the QA plan.
5. [II.F.2.] Is the QA Plan prepared in the format that is specified in EPA/QA/R-5 and EPA/QA/G-5?	**No** - title and table of contents pages are missing: details on the number of samples, type of sample containers, type and number of quality assurance field samples, precision and accuracy requirements, and calibration procedures.

6. [II.F.3.a)] Does the QA Plan include: details on the number of samples, type of sample containers, preservation of samples including temperature requirements, holding times, analytical methods, analytical detection and quantification limits for each parameter, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements?	**No** – the QA plan is missing: details on the number of samples, type of sample containers, type and number of quality assurance field samples, precision and accuracy requirements
7. [II.F.3.b)] Does the QA Plan include: description of flow measuring devices or methods used to measure influent and/or effluent flow at each point, calibration procedures, and calculations used to convert to flow units. If a permittee's facility has multiple effluent discharge points and/or influent points, it must describe its method of compositing samples from all points proportionally to their respective flows?	**No** If not, what is missing? **Calibration procedures**
8. [II.F.3.b.(1)] If you elected to take grab samples of influents, does the plan provide evidence of insignificant variability among influent sources?	**N/A**
9. [II.F.3.b.(2)] If you elected to not monitor small discharges that comprise less than 1% of the total raceway flows, does the plan provide justification that effluent quality of these discharges is the same as monitored discharges?	**N/A**
10. [II.F.3.c.] Does the QA Plan include a map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling?	**No** – Map was not included with QA plan.
11. [II.F.3.c.] Does the QA Plan have a location of the small discharges that comprise less than 1% of the total raceway flows?	**N/A**
12. [II.F.3.d.] Does the QA Plan include qualifications and trainings of personnel?	**No**
13. [II.F.3.e.] Does the QA Plan include the laboratory name and telephone number?	**Yes** – The QA lists Rangen Aquaculture Research Center (RARC) in Hagerman, ID. RARC is no longer operating.
14. [II.F.5.] Are copies of the QA Plan kept on site and made available to EPA and DEQ upon request? If lack of suitable storage area makes on-site storage impossible, is the QA Plan kept in the possession of staff whenever they are working on-site?	**Yes** **Yes**— Mr. L. Babington stated that the QA plan is kept in the vehicle that travels to the facility. The facility has no secure site for storage.
15. Is facility following / using the QA Plan?	**Yes**

BEST MANAGEMENT PRACTICES PLAN (BMP PLAN)	
Part III (see page 36). According to Part III.C., the permittee must develop and implement a BMP Plan which meets the specific requirements listed in Part III.E.	
1. Do you have a BMP plan? If not on site, is it in the possession of staff when they are	**Yes**— Mr. L. Babington stated that the BMP plan is kept in the vehicle that

working on-site?	travels to the facility.
2. When did you submit the certification (Appendix F) that a plan has been developed?	Mr. L. Babington stated that the last BMP plan certification was submitted on 2/3/2018.
3. Chemical Storage a. ensure proper storage to prevent spills, b. implement procedures for proper containing, cleaning and disposing of spilled material.	 **Yes** **Yes**
4. Structural Maintenance a. routinely inspect rearing and holding units and waste collection containment to identify and promptly repair damage, How often? b. regularly conduct maintenance of rearing and holding units and waste collection and containment systems to ensure their proper function	 **Yes** Daily **Yes**
5. Training Requirements: a. Train personnel in spill prevention and clean-up and disposal of spilled materials. b. Train personnel on proper structural inspection and maintenance of rearing and holding units and waste collection and containment systems.	 **Yes** **Yes**
6. Operational Requirements: a. Water which is disinfected with chlorine or other chemicals must be treated before it is discharged to waters of the U.S. b. Treatment equipment used to control the discharge of floating, suspended or submerged matter must be cleaned and maintained at a frequency sufficient to prevent overflow or bypass of the treatment unit by floating, suspended, or submerged matter. c. Procedures must be implemented to prevent fish from entering quiescent zones, full-flow and off-line settling basins. Fish which have entered quiescent zones or basins must be removed as soon as practicable. d. All drugs and pesticides must be used in accordance with applicable label directions (FIFRA or FDA) e. Chelated copper compounds and copper sulfate, when used, must be applied to only one raceway at a time. f. Identify and implement procedures to collect, store, and dispose of wastes, such as biological wastes, in accordance with IDAPA §02.04.17 and IDAPA §58.01.02. Such wastes include fish mortalities and other processing solid wastes from aquaculture.	 **Yes** **Yes** **Yes** **Yes** Mr. L. Babington stated that the facility does not use chelated copper compounds and copper sulfate. **Yes**

g. Implement procedures to control the release of transgenic or non-native fish or their diseases as specified in any permit(s) issued by the Idaho Department of Fish and Game for the importation, transportation, release or sale of such species, in accordance with IDAPA §13.01.10.100.	**Yes**
h. Implement procedures to eliminate the release of PCBs from any known sources in the facility, including paint, caulk, or feed	**Yes**
When was the BMP Plan reviewed within the past year (III.D.) and updated recently?	**Yes**—2/3/18 was the last update.

AQUACULTURE SPECIFIC REPORTING REQUIREMENTS (Part IV., Page 38)	
A. Drug And Other Chemical Use And Reporting Requirements (see pages 38-39)	
1. Do you use drugs, pesticides or other chemicals?	On as needed basis
If yes, ask to see the Chemical Log Sheet. (see Appendix G, page 91)	Observed record sheet
2. Are records being maintained of all applications?	**Yes**
3. When an INAD or extralabel drug is used for the first time, you are required to report this orally and in writing to EPA and DEQ. Have you used INADs or plan to use INADs or extra label drugs? If so, have you written to EPA and DEQ that you have signed up to use an INAD or prescription? (page 88) Have you provided an oral report to EPA and DEQ of an INAD or prescription use? (page 87) Have you provided a written report to EPA and DEQ of an INAD or prescription use? (page 89)	**N/A**
B. Structural Failure (see IV.B., page 39) Remind the interviewee of this new requirement: Failure or damage to the facility must be reported to EPA and DEQ orally within 24 hours and in writing within five days when there is a resulting discharge of pollutants to waters of the U.S.	**Completed**
C. Spills of feed, drugs, pesticides or other chemicals (see IV.C., page 39) Remind the interviewee of this new requirement: The permittee must monitor and report to EPA and DEQ any spills that result in a discharge to waters of the United States; these must be reported orally within 24 hours and in writing within five days.	**Completed**
D. Annual Report of Operations (see IV.D., page 40) Remind the interviewee of this requirement: The permittee must prepare and submit an annual report of operations by January 20th of each year to EPA and DEQ.(see Appendix H)	**Completed**
1. Did you submit the last report as required?	**Yes**
2. Is the annual report complete? (Check the report against the	**Yes**

required elements on pages 95-96.)	
Ask to see the annual logs of production. 3. Are the logs consistent with what is reported in the annual report?	**Yes**

4. Was the facility able to provide all the required paper documentation requested?	**Yes**

FACILITY PHYSICAL INSPECTION – SITE TOUR	
Objectives of the facility inspection include: identifying all discharges to the surface waters from the facility; observing and recording prohibited discharges or practices; and noting any problems. Many of these questions are subjective.	
1. Any excessive feed in the raceways?	**No**
2. Any excessive solids stirred up in raceways?	**No**
3. Are all the barrier dam boards in place and level?	**Yes**
4. Any excessive solids built up in quiescent zones?	**No**
5. Any excessive solids going over the dam boards.	**No**
6. Any fish observed in the quiescent zones?	**No**
Photo (s) of raceway(s) conditions above:	**See Exhibit C. Waypoint 379-381**
DISCHARGES	
Photo (s) of raceway(s), tailrace, and/or full-flow settling basin discharges.	**See Exhibit C. Waypoint 379-383**
Are there any unreported outfalls? (check observed against NOI)	**No**
If so, describe:	**N/A**
Photo (s) of receiving water(s), particularly documenting any of below:	**See Exhibit C. Waypoint 383**
1. Any floating solids or visible foam in other than trace amounts?	**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
4. Location of the receiving water monitoring.	At bottom of FFSB
5. If the facility has an **OLSB(s)**, is it discharging?	**N/A**
Photo (s) of OLSB discharges:	**N/A**
RECEIVING WATERS	
Photo (s) of receiving water(s), particularly documenting any of the items below:	**See Exhibit C. Digital Waypoint 383**
1. Any floating solids or visible foam in other than trace amounts?	**No**
2. Any evidence of discharged sludge, grit or accumulated solid residues?	**No**
3. Any floating or suspended or submerged matter, including dead fish, in amounts causing nuisance or objectionable condition?	**No**
FLOW MEASUREMENT DEVICE(S)	

1. Were flow measurements taken during inspection?	**No**
2. Location of flow measuring device for raceways:	Bottom of raceway #3
3. How are flow measurements taken?	Reading staff gauge and referring to water flow table, and verifying by measuring with a ruler at three locations across the weir.
4. Location of flow measuring device for OLSBs:	**N/A**
Photo (s) of taking flow measurement:	**N/A**
WATER TEMPERTURE MEASUREMENT	
1. Influent water Temp.	**N/A**
2. Effluent water Temp.	**N/A**
SAMPLING LOCATION & SAMPLING PREPARATION	
1. Are influent sample locations adequate?	**Yes**
2. Are effluent sample locations adequate?	**Yes**
3. Are samples refrigerated / iced down after sampling?	**Yes**
4. Are samples iced down during transportation to contract Lab?	**Yes**
SOLIDS CONTAINMENT & STORAGE	
1. Is the solids disposal area adequate?	**Yes**
2. Removed solids prevented from reentry to navigable waters?	**Yes**
3. Does the facility land apply solids or irrigate with or apply wastewater?	**Yes** - land application from cleaning the FFSB are applied to the agricultural field next to the facility.
INSPECTION CONCLUSION DATA SHEET (ICDS) INFORMATION	
1. Did you observe deficiencies (potential violations) during the on-site inspection?	**No**
2. If so, did you communicate them to the facility during the inspection?	**N/A**
3. Did the facility or operator take any corrective actions	**N/A**
4. Did you provide general compliance assistance during the inspections?	**Yes**- suggested that an updated NOI be submitted reflecting new owner and operator status.
5. Did you provide site-specific compliance assistance?	**No**

AREAS OF CONCERN

• QA plan not developed and implemented within 60 days of permit coverage.
• QA plan certification not submitted within 90 days of permit coverage.
• BMP plan not developed and implemented within 90 days of permit coverage.
• BMP plan certification not submitted within 90 days of permit coverage.
• The QA plan is not in the EPA format and is missing:
  • Updated water quality testing laboratory;
  • Calibration procedures;
  • Details on the number of samples;
  • Type of sample containers;
  • Type and number of quality assurance field samples;
  • Precision and accuracy requirements;

• Water quality testing laboratory name lists a company no longer in business; • Map(s) of sampling points, including receiving water sampling locations and justification for the choice of the sampling.
Other Issues: N/A

Exhibit A. DEQ DMR Review

DEQ conducted a DMR review from June 2014 through December 2017. The following is a summary of that review:

1. Water Right Flow. The water right for Irish Ponds is IDWR No. 47-7018 for 2.24 cfs from January 01 to December 31 for fish propagation.

2. TSS & TP Concentration Data. DEQ determined that the TSS and TP concentration data complies with Appendix D of the existing permit. The TP and TSS Net Load appeared not to be violated during the record review.

Table 2
Effluent Limitations for Facilities in the Upper Snake Rock Watershed

Facility Name	Permit Number	Parameter	Limitations (lbs/day)	
			Average Monthly	Maximum Daily
Rocky Ridge Ranch (Snyder Ponds)	IDG130102	Net TP	0.8	1.2
		Net TSS	46.0	87.5

3. Lab Data to DMR's.
DEQ reviewed the DMRs; and determined that no errors were made in the data.

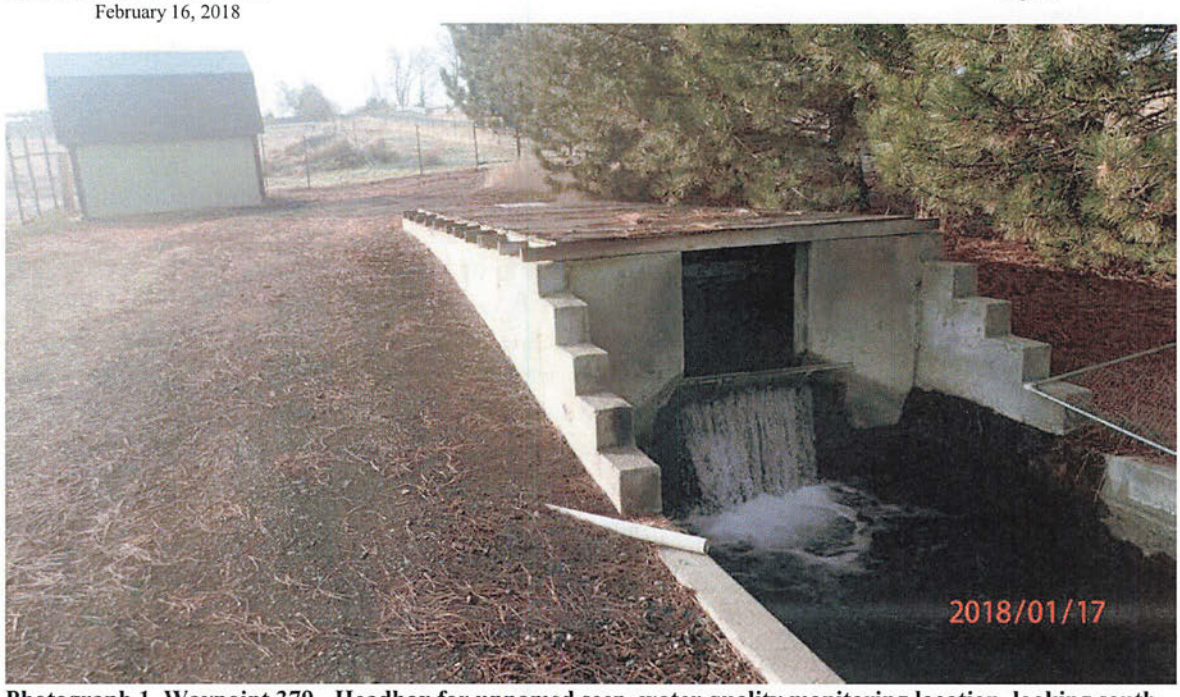
Exhibit B. Latitude/Longitude Waypoint Locations

The follow Google Earth map shows the photo waypoint locations where DEQ visited the facility during the site tour.

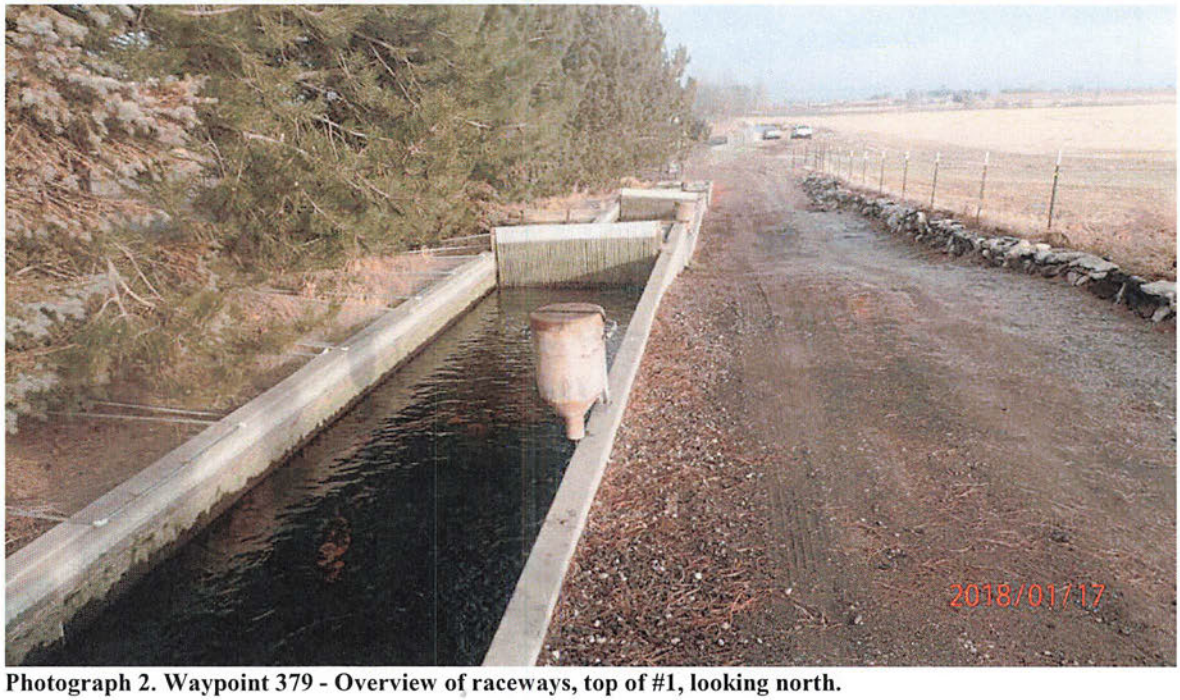
		Latitude	Longitude	Date/Time
WAYPOINT	379	42.58959959	-114.8097602	1/17/2018 9:21
WAYPOINT	380	42.58995683	-114.8097968	1/17/2018 9:29
WAYPOINT	381	42.59052881	-114.8097329	1/17/2018 9:32
WAYPOINT	382	42.59082561	-114.8097261	1/17/2018 9:33
WAYPOINT	383	42.5916322	-114.8097742	1/17/2018 9:37
WAYPOINT	384	42.59009262	-114.8098763	1/17/2018 11:41

Exhibit C. Photographic Documentation

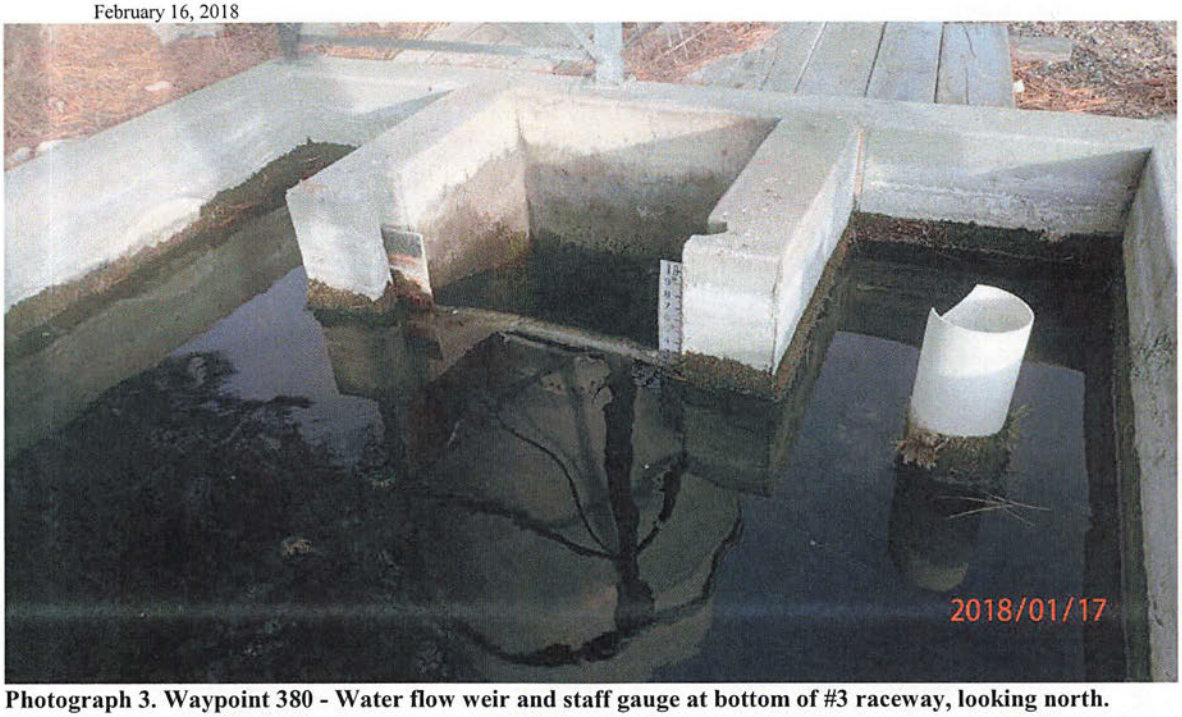
Table of Photographs:



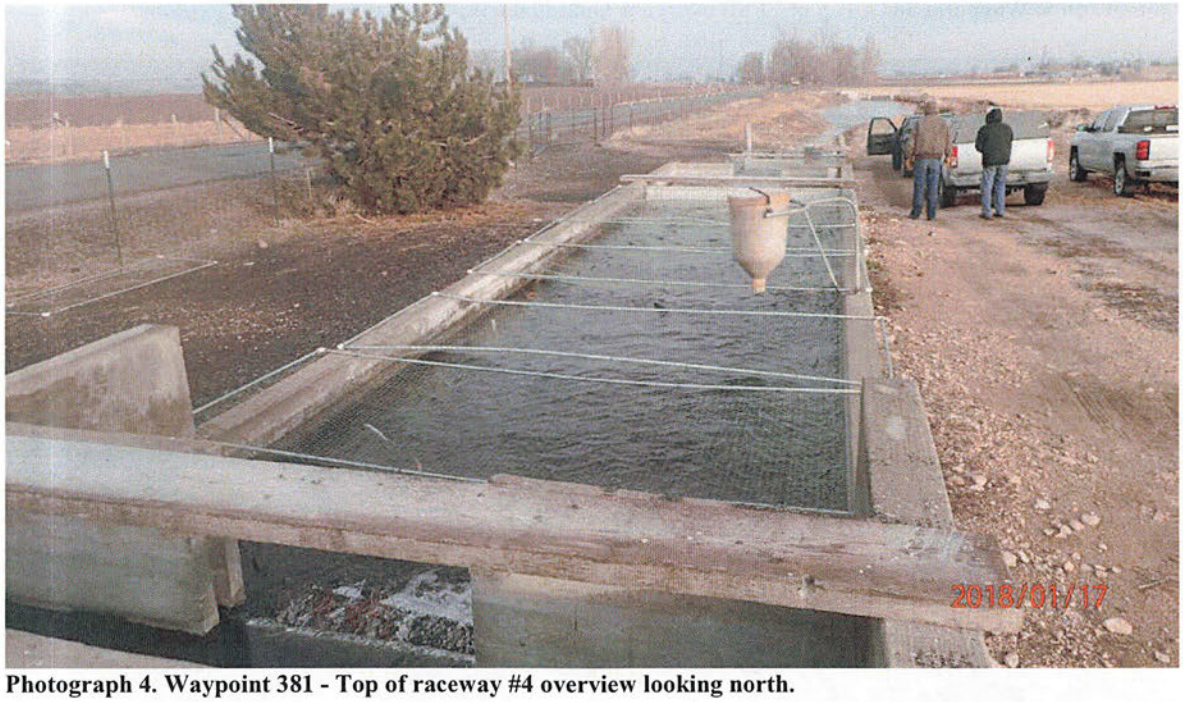
Photograph 1. Waypoint 379 - Headbox for unnamed seep, water quality monitoring location, looking south.



Photograph 2. Waypoint 379 - Overview of raceways, top of #1, looking north.



Photograph 3. Waypoint 380 - Water flow weir and staff gauge at bottom of #3 raceway, looking north.



Photograph 4. Waypoint 381 - Top of raceway #4 overview looking north.

Photograph 5. Waypoint 382 - Top of FFSB overview looking north.

Photograph 6. Waypoint 383 - Discharge location at bottom of FFSB, water quality monitoring location, looking southwest.